

**District of Columbia
AFCARS
Assessment Review
Report**

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and
Office of Information Services
Administration for Children and Families
U.S. Department of Health and Human Services**

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Executive Summary

From December 6 – 10, 2004 staff of the Children’s Bureau, Administration for Children and Families (ACF) Region III, and the Office of Information Services (OIS) conducted an assessment review of the District of Columbia’s Adoption and Foster Care Analysis and Reporting System (AFCARS). The AFCARS data used for the review was from the report period April 1, 2004 through September 30, 2004 (2004B).

Two major areas are evaluated as part of an AFCARS assessment review (AAR): the AFCARS general requirements and data elements. The general requirements include the population that is to be reported to AFCARS and the technical requirements for constructing a data file. The data elements are assessed on the basis of whether the District is meeting the AFCARS definitions for the information required, if the correct data are being entered and extracted, and the quality of the data submitted. Each of the 103 foster care and adoption data elements is rated on the basis of its compliance with the requirements in the AFCARS regulation, policy guidance, and technical bulletins. Information that is collected from each of the components of the review is combined to rate each data element. A scale of one (does not meet AFCARS standards) to four (fully meets AFCARS standards) is used to assign a factor to each element. The general information requirements are also assessed and rated separately using the same scale. A summary of the significant findings is included in the report, and detailed findings can be found in the “Detailed Findings” matrices for the foster care and adoption data elements, and the general requirements (Tab A). The minimum tasks that are required to correct the District’s reporting of the AFCARS data are included in the AFCARS Improvement Plan (Tab B). The rating factors received by the District are:

General Requirements	Rating Factor
Foster Care/Adoption Population Standards	4
Technical Standards	4

Rating Factor	Foster Care (66 elements)	Adoption (37 elements)	Full Data Set (103 elements)
4	16 (24%)	10 (27%)	26 (25%)
3	44 (67%)	20 (54%)	64 (62%)
2	6 (9%)	7 (19%)	13 (13%)
1	0	0	0

The District is in full compliance with the foster care and adoption population requirements and the technical standards. In regard to the data elements, the most significant area the District needs to address is the quality of the data.

The District needs to improve the quality of its data. A majority of items were given the rating of “3” because of underreporting of information and will necessitate additional training for caseworkers and monitoring by supervisors to ensure accurate data entry. The District may want to consider reviewing the data in the file at the time of a periodic review to ensure it is accurate and up-to-date. (See AFCARS Federal regulation at 45 CFR 1355 Appendix A, I. I. E.)

Changes made to the system with regard to data entry will inevitably result in improved data accuracy and quality. The District's semi-annual data submission may, as a result, fail to meet the missing data standard. In order to ensure that the data are complete, the agency must require workers to enter the data and assess its validity prior to submitting it to the Administration for Children and Families (ACF). To do so, the District may utilize the management reports created by the agency, as well as the Data Quality Utility and the Frequency Utility issued by ACF.

Tab B contains the AFCARS Improvement Plan (AIP). The AIP contains the AFCARS data elements that do not meet the requirements in the Federal regulations. Each matrix contains a column that identifies the task(s), the date the task is to be completed, and one for comments.

Within 30 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, the District staff are to submit the Improvement Plan electronically to the ACF Regional Office, OIS, and my staff with estimated due dates for completing the tasks in the Improvement Plan.

The District should contact the ACF Regional Office once it has completed its AIP. The ACF Regional Office will then provide the District with a set of test case scenarios. These scenarios test the system by requiring the District to enter the information and extract the data, which is then compared to known answers for each scenario. Dates for the submission of the test data file will be arranged with the ACF Regional Office and the Office of Information Systems.

In order to assess the quality of the data, a frequency report will be generated on the data submitted after the system changes have been implemented. Once ACF and the District agree that the quality of the data is acceptable, and all tasks and revisions, based on the test cases, have been completed, the District must submit the completed AIP to the ACF Regional Office. The District will receive a letter summarizing the final results of the review.

The ACF Regional Office will work with the District to determine if technical assistance is needed, and available, to implement the AFCARS Improvement Plan. The District may obtain technical assistance from the Children's Bureau's resource centers. To request technical assistance from the resource centers, contact your ACF Regional Office.

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BACKGROUND

The Children's Bureau is committed to assisting States collect reliable and accurate data from the Adoption and Foster Care Analysis and Reporting System (AFCARS). To this end, an AFCARS assessment review (AAR) process was developed. The State's information system is assessed against the AFCARS requirements in the Federal regulation and policy issuances. The AFCARS assessment review evaluates a State's information system's capability to collect, extract, and transmit the AFCARS data accurately to the Administration for Children and Families (ACF). A second focus of the AFCARS review is to assess the accuracy of the collection and documentation of information related to the foster care and/or adoption case of a child.

The review process goes beyond the edit checks that must be met by a State in order to pass the AFCARS compliance error standards. The review also ascertains the extent to which a State meets all of the AFCARS requirements and the quality of its data. Additionally, while the review is an assessment of the State agency's collection and reporting of AFCARS data, it is also an opportunity for Federal staff to provide substantive technical assistance to State agency staff. During the review, the Federal team identifies improvements to be made to the system and recommends changes to the program code used to extract the AFCARS data.

Each AAR consists of a thorough analysis of the State's system technical documentation for the collection, extraction and reporting of the AFCARS data. In addition to this review of documentation, the Federal AFCARS team reviews each data element with the State team to gain a better understanding of the State's child welfare practice and policy and State staff's understanding of the data elements. The data is also compared against a small, randomly selected number of hard copy case files. Through this exercise, the accuracy of the State's data conversion process and understanding of the information reported to AFCARS is tested.

RATING FACTORS

Two major areas are evaluated during an AFCARS assessment review: the AFCARS general requirements and the data elements. The general requirements include the population that is to be reported to AFCARS and the technical requirements for constructing a data file. The data elements are assessed to determine whether the State is meeting the AFCARS definitions for the information required, if the correct data is being entered and extracted, and the quality of the data submitted.

AFCARS data submissions are subject to a minimal number of edit checks, as listed in Appendix E of 45 CFR Part 1355. Based on these edit checks, substantial compliance can be determined for the timely submission of the data files, the timeliness of data entry of certain data elements and whether the data meets a 90% level of tolerance for missing data and internal consistency checks. However, "substantial" compliance does not mean a State has fully implemented the requirements in the regulations. This explains why a State formerly may have been penalty-free, but does not have accurate and reliable quality data. For example, data cannot be assessed to determine whether the State submitted the correct foster care population required by the regulations.

Information collected from each component of the assessment review is used to rate each data element. The general requirements are assessed and rated separately using the same scale. A scale of one (does not meet the AFCARS standards) to four (fully meets the AFCARS standards) is used to assign a rating factor. Below is a chart that lists the factors that were used for the analysis of the State’s AFCARS.

RATING FACTOR	DEFINITION
1	<p>The AFCARS requirement(s) has not been implemented in the information system. For example:</p> <ul style="list-style-type: none"> • The State information system does not have the capability to collect the correct information (i.e., there is no data field on the screens). • There is no program logic to extract the data.
2	<p>The technical system requirements for AFCARS reporting do not fully meet the standards. For example:</p> <ul style="list-style-type: none"> • The State information system has the capability (screen) to collect the data, but the program logic is incorrect - - <ul style="list-style-type: none"> • The State uses defaults for blank information. • Information is coming from the wrong place on the system. • Information is located in the wrong place on the system, i.e., it should be in foster care screens, not adoption screens. • The system needs modification to encompass more conditions, e.g., disability information.
3	<p>The technical system requirements for AFCARS reporting are in place, but there are data entry problems affecting the quality of the data.</p> <ul style="list-style-type: none"> • The system functions as required, but-- <ul style="list-style-type: none"> • the data are underreported due to inconsistent data entry. • the data are not being entered and/or there are no supervisory controls for ensuring data entry.
4	<p>All of the AFCARS requirements have been met. The information system is functioning as required, and the information is being accurately collected and extracted.</p>

For data elements and general requirements that do not meet existing AFCARS standards (factors 1 through 3), the State is required to make the corrections identified by the review team. It is possible that the problem with a data element and data are due to both system issues and case worker data entry issues. In such instances, the element will be rated a “2” to denote the need for modification to the system logic. Once the corrections are made to the system, the data will be re-analyzed. If problems related to case worker training or data entry still exist, then a “3” will be assigned to the requirement. A rating factor of “4” (compliant) will not be given to the element until all system issues and/or data quality issues have been addressed.

When assessing the general requirements, all specifications must be met in order for the item to fully satisfy the requirement. If the issue is a programming logic problem, then a “2” will be

assigned. If it appears the problem is due to data entry, then a “3” will be assigned to the requirement.

Some data elements are directly related to each other. When this occurs, all related elements are given the same rating factor, because incorrect programming logic could affect the related data elements.

The State is required to make the changes to the information system and/or data entry in order to be compliant with the applicable requirements and standards. Since the AFCARS data are used for several significant activities at the Federal and State level, the State must implement the AFCARS Improvement Plan, under Tab B of this report, as a way to improve the quality of its data.

FINDINGS

This section provides the major findings resulting from the review of the District’s AFCARS data collection. Tab A provides detailed information on the findings for the general AFCARS requirements, each of the foster care and adoption data elements, and the case file review. The AFCARS data used for the review were from the report period April 1, 2004 through September 30, 2004 (2004B).

As part of the post-site visit analysis, the District’s documents, the data, the case file review findings, team member notes, and corrections to the program code submitted by the District are assessed to make the final determination of findings. As a result, the original rating factors were modified from those given at the end of the on-site review. The findings matrix in Tab A reports the previous rating with a “strike-through” mark on it, and the new rating. The AFCARS Improvement Plan in Tab B contains the final rating factor.

General Requirements

The District is in full compliance with both the foster care and adoption population requirements and the technical requirements.

Data Elements – Technical Changes

There are six foster care elements and seven adoption elements that require system modifications.

- Foster care element #10, was child diagnosed with a disability

It was identified that the data reported for this element is underreported and also is misrepresenting the characteristics of children in the District’s foster care system. Corrections were made to the program code regarding how this information is extracted from the system. The screen correctly contained this question with each of the responses, however the program code did not use this field to extract this information. Instead, the program derived the response

by assessing if there were any diagnosed conditions selected in foster care elements number eleven through fifteen. ACF will review the District's data submissions for improvement in the quality of the data.

One of the issues identified during the entry of the test case while on-site was that there is no alert to the worker if the response to this question is either "no" or "not yet determined" and a disability condition applies in elements #11-15. Issues related to this were identified during the case file review. There were several error cases that were reported as "no" instead of "yes." Therefore, a system alert and additional training need to be implemented in order to improve the accuracy of the data for this element and elements related to diagnosed disabilities.

- Foster care elements #11-15 and Adoption elements #11-15, diagnosed disabilities

In addition to the issues identified for foster care element #10, there are issues related to how diagnosed conditions are mapped to the AFCARS values. Many of them are mapped to the wrong category and even more conditions are being mapped than should be included for AFCARS. The District should map chronic, debilitating and not acute conditions to AFCARS values.

- Adoption element #7, Child's Race

During the post-site visit review of documentation and notes, an error in this element was found. This field is initialized to zeros and if none of the races are selected, this element is defaulted to "unable to determine." The use of "unable to determine" should only be used if the child was abandoned or if the child's parent, or if age appropriate, the child, refuses to provide the race information. Race and ethnicity information are to be self-reported by the client. Workers must be trained to determine an individual's race/ethnicity by asking clients to identify all appropriate races.

- Adoption element #18, Mother Married at Time of Birth

The value "unknown" is mapped to "unable to determine." This may be incorrect if the District's definition of "unknown" is not identical to the definition of "unable to determine" in AFCARS. The District needs to provide ACF with its definition of "unknown."

Also, this question currently is on the adoption screens. While it is an AFCARS adoption file question, it is information that is gathered at the beginning of a case, not the end. The District must add the question to a foster care case management screen or the client general information screen. If this question is left on the adoption screen, it should be populated by the response from the case management screen.

The case file review findings indicated that 100% of the records analyzed did not match what was reported in AFCARS. In every record the response for AFCARS was "unable to determine." It seems unlikely that all the children adopted in this report period had been abandoned children. In three records, the reviewer was clearly able to determine the mother's marital status.

Data Quality

The quality of the data needs to be improved. There were 64 elements (44 foster care and 20 adoption) that require additional training and supervisory oversight. Additionally, in some instances the quality of the data needs to be further assessed due to the corrections made by the staff to the program code.

There were instances where missing data had been defaulted to a valid AFCARS value. Now that these defaults have been removed, underlying data entry issues will be unmasked. The District needs to incorporate ongoing data quality assurance to ensure that the data are correct and consistent.

One issue related to missing data was in the area of foster parent information. The District contracts for placement services with private child-placing agencies. However, data on the demographics of the foster families are not entered in a timely manner into the system. This is required information that the District must provide and it is important to assess the make-up of families that volunteer to be foster parents.

There are also issues that are probably related to data conversion. For the removal and placement information, most of the errors identified could be attributed to a lack of data entry when the District's information system became operational. Data entry was not identified as an urgent issue and should be addressed on cases that are now closed when and if they re-open. The District should encourage workers to clean up the removal and placement information on open cases in which there was a prior foster care history that occurred before use of the new information system.

CONCLUSION

The District has taken a very proactive approach to making necessary technical corrections, both as a result of this review and prior technical assistance provided to the District by the Children's Bureau. The District has also begun to implement methods to assess the quality of its data on an ongoing basis. The District will need to add the areas noted in the "findings" section of this report to its training and quality assurance plans.

The District has a minimal number of "technical" corrections to make to the program code and the screens. Once changes are made to the program code and/or to the data entry screens, the quality of the data will need to be monitored for accuracy. It may be necessary to implement additional training for caseworkers and monitoring by supervisors to ensure accurate data entry. The District may want to consider system ticklers/edits that will remind workers to update the information at appropriate times, and review the data in the file at the time of a periodic review. (See AFCARS Federal regulation at 45 CFR 1355 Appendix A, I. I. E.)

Tab B contains the AFCARS Improvement Plan (AIP). The AIP contains the AFCARS data elements that do not meet the requirements in the Federal regulations. Each matrix contains a column that identifies the task(s), the date the task is to be completed, and one for comments.

Within 30 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, the District staff are to submit the Improvement Plan electronically to the ACF Regional Office with estimated due dates for completing the tasks in the Improvement Plan. An electronic copy of the final matrices will be e-mailed to your staff. The District should provide electronic quarterly updates of its progress to the Regional Office, Alba Sierra and Angelina Palmiero. Test cases will be provided to the District once all of the required modifications are completed. Dates for the submission of the extracted test data file will be arranged with the ACF Regional Office and OIS. Once ACF and the District agree that the quality of the data is acceptable, the AFCARS Improvement Plan will be considered finished, and a letter will be sent to the District from the Children's Bureau confirming this fact. The letter will include a summary of the actions taken by the District and the completed AFCARS Improvement Plan.

Additionally, the District's plan for implementing the changes to the system and for caseworker training must be included in the District's title IV-B Annual Progress and Services Report as part of the information required in 45 CFR 1357.15(t) and 45 CFR 1357.16(a)(5).

The District should contact the ACF Regional Office once it has completed its AIP. The ACF Regional Office will then provide the District with a set of test case scenarios. These scenarios test the system by requiring the District to enter the information and extract the data, which is then compared to known answers for each scenario. Dates for the submission of the test data file will be arranged with the ACF Regional Office and the Office of Information Systems.

In order to assess the quality of the data, a frequency report will be generated on the data submitted as changes to the system and training are addressed and after all system changes and training are completed. Once ACF and the District agree that the quality of the data is acceptable, and all tasks and revisions based on the test cases have been completed, the District must submit the completed AIP to the ACF Regional Office. The District will receive a letter summarizing the final results of the review.

The ACF Regional Office will work with the District to determine if technical assistance is needed, and available, to implement the AFCARS Improvement Plan. The District may obtain technical assistance from the Children's Bureau's resource centers. To request technical assistance from the resource centers, contact your ACF Regional Office.